

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

*In re MedStar ERISA Litigation*

Master File No. 1:20-cv-01984-JKB

Chief Judge James K. Bredar

Fairness Hearing: September 5, 2024

**MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND ATTORNEYS' FEES, EXPENSES, AND CASE CONTRIBUTION AWARDS**

Plaintiff Elsa Reed ("Plaintiff"), on behalf of the Settlement Class and the MedStar Health, Inc. Retirement Savings Plan ("Plan"), hereby moves the Court pursuant to the Court's order granting preliminary approval of the Settlement<sup>1</sup> for entry of an Order that: (1) approves the Settlement memorialized in the Settlement Agreement dated January 19, 2024 (ECF No. 121-1); (2) maintains certification of the Settlement Class; (3) finds the manner in which the Settlement Class was notified of the Settlement was the best notice practicable under the circumstances, and fair, reasonable, and adequate; (4) approves the Plan of Allocation; and (5) awards Class Counsel attorneys' fees of one-third of the Settlement Fund and litigation expenses of \$306,322.21; and (6) authorizes a case contribution award of \$15,000 to Plaintiff. Defendants do not oppose the Motion.

The Parties have worked cooperatively to effectuate the Notice Plan and Plaintiff now moves the Court to enter an order granting Final Approval of the proposed Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class, and granting the related applications. Plaintiff brings this Motion pursuant to Federal Rule of Civil Procedure 23(e), and it is supported by the concurrently filed Memorandum of Law; the Declaration of Laurie

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the same meaning as in the Settlement Agreement (ECF No. 121-1). The Court granted preliminary approval in its Order entered on March 8, 2024 (ECF No. 122).

Rubinow; the Declaration of Cornelia Vieira and supporting exhibits; the pleadings, records, and papers on file in this action; and all other matters properly before the Court.

Plaintiff stands ready to provide any additional information that the Court may require in connection with its consideration of the Motion.<sup>2</sup>

Dated: July 8, 2024

Respectfully submitted,

/s/ Laurie Rubinow

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<sup>2</sup>A [proposed] Final Approval Order is attached as Exhibit D to the Settlement Agreement (*see* ECF No. 122-1, at Ex. D). Plaintiffs would be pleased to provide a Word version of the [proposed] Final Approval Order if helpful to the Court.

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*Attorneys for Plaintiff, the Plan,  
and the Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2024, I caused the foregoing document to be electronically filed with the Clerk of Court, and upon the counsel of record using the CM/ECF system.

/s/ Laurie Rubinow  
Laurie Rubinow